UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No.: 1:25-cv-20757-JB/Torres

JANE DOE,
Plaintiff,
v.
STEVEN K. BONNELL II,
Defendant.

DECLARATION OF STEVEN K. BONNELL II

- I, Steven K. Bonnell II declare, pursuant to 28 U.S.C. § 1746 as follows:
- 1. I am the defendant in the above-captioned action. I am over 18 years of age and competent to provide testimony under oath. I submit this declaration in support of my motion to dismiss the Amended Complaint for lack of subject matter jurisdiction.
- 2. I have personal knowledge of the matters contained herein and if called upon to testify could offer competent testimony thereto.
- 3. In or around November 2024, portions of my Discord communications with an individual named "Rose" were accessed from Rose's account, downloaded, and published on the KiwiFarms website by an unknown third party with the screenname "SoloTinyLeaks." The leaked screenshots display dates in European format (day/month/year). Thus, the entry "10/04/22" refers to April 10, 2022—not October 4, 2022. Attached hereto as **Exhibit A** is a true and correct copy of the leaked screenshot of *Rose's side* of our Discord conversation, reflecting my transmission of the Video to Rose on April 10, 2022.
- 4. For comparison, attached hereto as **Exhibit B** are true and correct copies of *my* side of the same Discord communications with Rose, which were not leaked to the public.

Because I am located in Florida, my own logs show the same communications as "04/09/2022" (April 9, 2022 at 8:36 p.m. ET), which would have been April 10, 2022 in Europe. I did not transmit the Video to Rose, or to anyone else, after April 9, 2022.

- 5. In the days after I transmitted the Video to Rose on April 9, 2022, I continued to communicate with Rose on Discord. Those subsequent communications were also publicly leaked on KiwiFarms and reflect the European date format, as published by SoloTinyLeaks. Attached hereto as **Exhibit C** are true and correct copies of side-by-side comparisons of my original Discord logs with Rose, as compared to the leaked screenshots of *Rose's side* of the same conversations. For example, on April 14, 2022, I messaged Rose on Discord, "Just streaming," and the date stamp on the leaked communication is depicted as "14/04/2022."
- 6. Attached hereto as **Exhibit D** is a true and correct screenshot of a post by Solotinyleaks on KiwiFarms, depicting the original filename of the Video as "VID_240100707_144752_318-1.mp4." This filename provides a unique identifier for the Video, against which other files can be compared. It also confirms that the Video file was transferred directly through Discord as an attached .mp4 file, and not transmitted via a Google drive link.
- 7. I have preserved the entirety of my communication logs with Abbymc, including all media files. I did not transmit or otherwise disclose the Video depicting Plaintiff to Abbymc at any time.
- 8. Attached hereto as **Exhibit E** is a true and correct log of every media file and Google Drive link that I ever sent to Abbymc. The log shows the file names, creation dates, and transmission dates of every file I ever sent to Abbymc. The file name of the Video depicting Plaintiff ("VID_240100707_144752_318-1.mp4") appears nowhere on the log because I never

sent the Video to Abbymc. Furthermore, every media file I sent to Abbymc bears a 2023 creation date stamp, unlike the Video depicting Plaintiff, which was created in 2020.

- 9. As further reflected in Exhibit E, I sent Abbymc two Google Drive links on November 3, 2023. Those links were to videos of me with another woman with the screenname "Peach." Attached hereto as **Exhibit F** are true and correct copies of my chat logs with Peach, showing that she received the exact same Google Drive links that I sent to Abbymc, bearing the same unique Google Drive URLs. In these chat logs, babypeach expressly acknowledged that the Google Drive links depicted videos of herself, and that she consented to my sharing of those files.
- Sometime that afternoon, I left my home temporarily, and I permitted Abbymc to stay in my home while she waited for her flight that evening. Unbeknownst to me at the time, Abbymc began snooping around my house and studio, taking videos and photographs of my possessions. She sent a photograph of my open desktop computer to her friend Darius, with the message, "major leaks prob." Without my knowledge, Abbymc had access to my computer and was able to view private files directly from my desktop. To the extent Abbymc claims to have seen the Video depicting Plaintiff, she could only have done so while snooping through my computer not because I ever transmitted the Video to her. Attached hereto as **Exhibit G** are true and correct copies of screenshots of Abbymc's text messages with Darius, which include the photographs of my desktop computer. These screenshots were subsequently sent to me by the recipient, Darius.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on September 19, 2025.

Steven. K. Bonnell II